


ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

FILED
U.S. DISTRICT COURT
AUGUSTA DIV.

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WILLIAM H. CARTER
Plaintiff

vs

NCO FINANCIAL SYSTEMS
Defendant

Case No: CV 311-107

MOTION FOR ORDER OF ISSUANCE OF SUBPOENA

Plaintiff, William H. Carter hereby moves this Honorable Court for issuance of a subpoena to, Mona Sky, Accounts Manager at National Collection Bureau, Inc., 610 Waltham Way, Sparks, Nevada 89434 for the production of documents and information relating to this instant action. This motion is supported by the declaration of William H. Carter.

DECLARATION

I, William H. Carter, declare as follows:

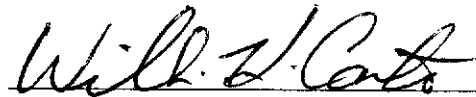
1. I am the Plaintiff in this action.
2. I have need to obtain documents and/or information pertaining to this instant action to include;
 - a. The exact source from which First National Collection Bureau Inc., obtained an account allegedly owed to First Premier Bank which Plaintiff disputed with them on October 19 of 2011 by USPS Certified Mail #70100780000022759868.

- b. The identity of the entity from which they “purchased” or “received assignment for collection” of the “alleged account”.
 - c. Any documents that evidence the purchase of a debt alleged to be owed by William H. Carter to First Premier Bank with an account number ending in 1656, or in the alternative the assignment of any rights to collect the same.
 - d. Any documents that evidence the basis for the decision to cease collection efforts on the “alleged account” regarding William H. Carter by First National Collection Bureau Inc.
3. I want First National Collection Bureau Inc., to deliver above documents and information to William H. Carter, 311 Bethel Street, Eastman, Georgia 31023 within 10 days of the service of the subpoena.

I declare under penalty of perjury that the foregoing statement true.

WHEREFORE, Plaintiff moves this Honorable Court to grant the order for subpoena of Mona Sky of First National Collection Bureau Inc. for documents and information in the above styled case.

Dated in Eastman, Georgia on November 14, 2012



Plaintiff, William H. Carter
311 Bethel Street
Eastman, Georgia 31023
478-689-0708

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CERTIFICATE OF SERVICE

This is to certify that I have mailed copies of the above document(s) by first class mail USPS to all parties listed below.

Dated: 11-14-2012

Respectfully Submitted,


William H. Carter
311 Bethel Street
Eastman, Georgia
31023

NCO FINANCIAL SYSTEMS, INC.
C/O Glenn E. Jones
Hall, Booth, Smith & Slover, P.C.
3528 Darien Highway, Suite 300
Brunswick, Georgia 31525

Carter
311 Bethel St.
Eastman, GA
31023

Clerk of Court
PO Box 1130
Augusta, Georgia
30902

